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ATAT

A. J. Calabrese
UAM Vice President
Southern States

Room 10144
1200 Peachtree St.
Atlanta, GA 30309
404 810-4575
FAX: 404 810-4583

October 20, 1997

Mr. Mark Feidler, President
BellSouth Interconnection Services
4511 BellSouth Center
675 West Peachtree Street
Atlanta, Georgia 30375

Dear Mark:

As you and I have discussed many times over the past months, it is absolutely critical to AT&T, as it is with new local market entrants, to have operational parity with BellSouth. The Interconnect Agreement our two companies signed requires it, the Telecommunications Act demands it, and the Eighth Circuit Court ruling does nothing to alter these obligations . After months of negotiations and discussions at all levels, the fact that we continue to struggle on a daily basis to achieve practical, operational parity causes me great concern. This is what prompts me to write this letter today. Specifically, I would like to again ask for your help in removing barriers to the resolution of two related operational parity deliverables: 1) AT&T receipt of all BellSouth system business rules for the rejection of orders. 2) The electronic reject capability required by the Interconnection Agreement that is already months late.

First, I ask you to break the logjam on BellSouth's providing all the editing rules for BellSouth's ordering systems -- LESOG, LEO, and SOCS/SOER. Your team provided the LESOG edit rules on September 25, 1997, and owes us a confirmation that we have the complete LEO system rules. However, you have neither provided the SOCS/SOER system edits nor given a date by which such edits will be provided. It has to be apparent that knowing the "rules" that the BellSouth ordering systems use to reject orders would benefit both AT&T and BellSouth by minimizing end-user customer dissatisfaction over problems with getting service. For any AT&T order to successfully pass through BellSouth's systems, it must "survive" all of the system edits that BellSouth's systems employ. AT&T needs to know, and be able to handle, all the potential

reasons/rules that might cause AT&T customer orders to be rejected. With this information, edits on our side of the interface can be developed to complement your edits. Sharing such information will also provide tangible operational benefits for both AT&T and BellSouth. As the edits are understood and operationalized, AT&T and BellSouth would not have to be engaged in so much follow-up on rejected orders. The result should be fewer "reworks" of orders and improved customer service.

Second, I request that you personally see to it that the electronic reject capability required by our Interconnection Agreement be implemented. I know you are equally aware of the contract provisions which obligate BellSouth to provide this capability. While I acknowledge your AT&T account team's attempts to move this issue through your Contract Compliance organization, I must insist that you use your position as AT&T's executive advocate at BellSouth to ensure an immediate resolution of this issue which BellSouth has repeatedly delayed since the March 31, 1997, date specified in the Interconnect Agreement. Despite BellSouth's comments to the contrary, an electronic reject capability will be a great improvement over that provided by the manual facsimile mode both in terms of accuracy and completeness, as well as efficiency (e.g. incomplete and insufficient reject detail is often provided on the manual reject, whereas the ability to receive reject details electronically reduces turn around time and minimizes re-entry errors).

Mark, I think you can appreciate the untenable position imposed on AT&T by BellSouth's delaying the provision of the requested edit rules and the electronic reject capability. Under the circumstances, there is no way for AT&T to even hope to match the level of service that BellSouth can provide because we don't even have access to the same information that BellSouth has – information necessary for orders to just pass through BellSouth's systems. Our customers are rightfully frustrated, and for that matter, so are our employees.

BellSouth's refusal to provide this information and to implement the electronic reject capability has contributed to the high number of rejected orders AT&T has experienced. Because of the customer dissatisfaction created by rejected orders, we have had to curtail our marketing program to a minimal number of orders to effect "damage control" in the marketplace we are trying to enter. This situation is adversely affecting AT&T's entry into local services in the Southeast and is intolerable. To enable AT&T's ordering process to be effective and begin to approach parity with BellSouth's ordering process we have the following interrelated requirements: 1) a detailed explanation of the business rules and edits as outlined above, 2) a mapping of these edits to reject codes that BellSouth is providing, and 3) an electronic capability to deliver and receive the

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reject codes. BellSouth needs to fulfill its obligations. Therefore, your immediate attention is requested.

I await your reply and your plan to address and close these two very important parity concerns.

Sincerely,

Al Calabrese

cc: Quinton Sanders
    Pam Nelson

PS: Given my several discussions with Quinton Sanders about the fact that our volumes have always been within our forecast, and well below BellSouth's stated capabilities to process orders, I have not responded in writing to Quinton Sanders' letter of August 15 expressing BellSouth's surprise at the volume of AT&T orders in the early August time frame. I would be glad to send you a more formal response to Quinton's letter if you would like more details on the actual volume of orders entered compared to the forecasted amounts.
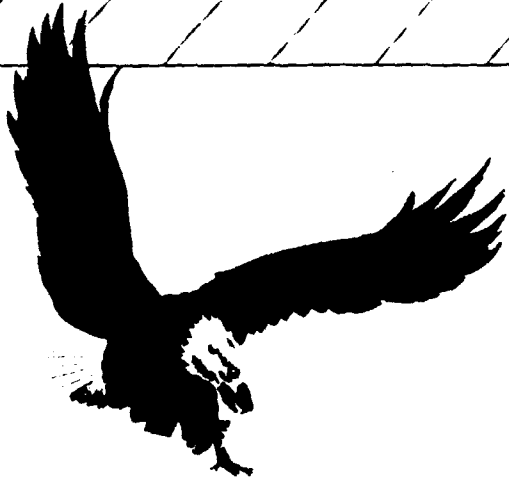
ATTACHMENT 63
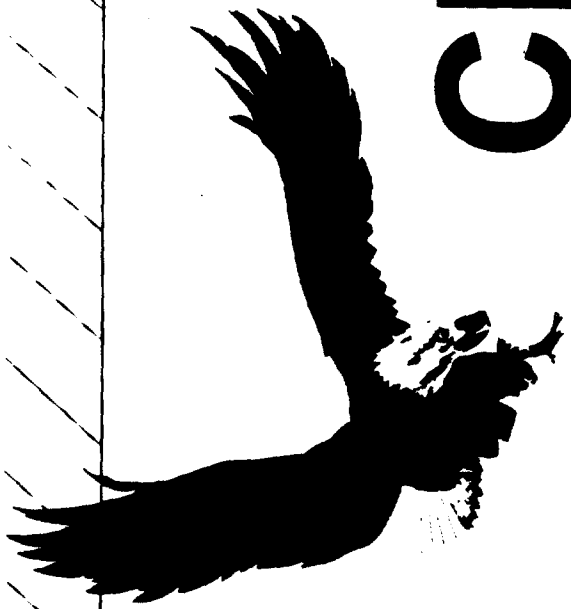
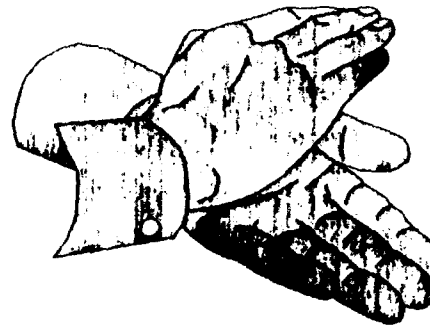# BellSouth CLEC Forum
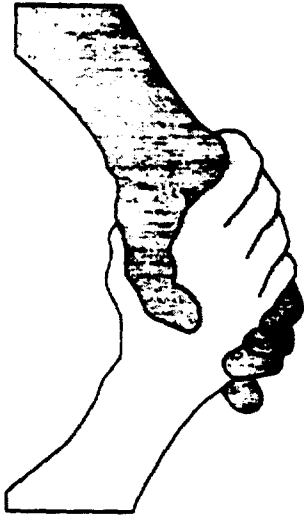
October 30th & 31st, 1997

ERRORS, EDITS, & ENDEAVORS

All LSRs need to be "electronically rejected or statused", or "electronically FOC'd" within 24 hours after being received.

ERRORS, EDITS, & ENDEAVORS

REJECTS

Fatal Errors

Clarifications
(Non-Fatal Errors)

(Hard Errors)

(Soft Errors)

LSR is electronically
returned to CLEC
(No service order is
generated, mechanically
or manually)

LSR/Order falls out for manual
processing by LCSC Personnel.
"Clarifications" will be
electronically sent to CLEC
by LCSC.

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What are Fatal Errors?

1. The absence of valid data in a field that is unconditionally required on the LSR

     and / or

2. The appearance of any data in a field that is unconditionally prohibited from the LSR

     and / or

What are Fatal Errors?
(continued)

3. The absence of valid data in a field that is conditionally required based on specific criteria

   and / or

4. The appearance of any data in a field that is conditionally prohibited based on specific criteria

   and / or

What are Fatal Errors?
(continued)

5. The appearance of data that does not meet Integrity criteria

    and / or

6. Other fatal errors as specifically defined to support BellSouth Tariffs and Business Rules

    (see attached examples)

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How BellSouth Determines Fatal Errors

1. Ordering and Billing General Ordering Rules / Information (SR STS-471070, Section 2.4, dated December 2, 1996) provides the following conventions for each data element that applies to an LSR.

How BellSouth Determines Fatal Errors (continued)

- "Required - is defined as the field <u>must</u> be populated."

- "Optional - is defined as the field may or may not be populated."

- "Prohibited - is defined as the field <u>must</u> <u>not</u> be populated."

How BellSouth Determines Fatal Errors (continued)

- "Conditional - is defined as the field is dependent upon the relationship to another entry as specified in the usage statement and is dependent upon the presence, absence or combination of other data entries.

How BellSouth Determines Fatal Errors (continued)

2. BellSouth Tariffs

3. BellSouth Business Rules

How will BellSouth notify CLEC(s) of Fatal Error Conditions?

- Use the 855/865 EDI Transaction Set to electronically notify the CLEC that an LSR is being rejected and returned due to one or more fatal error conditions.

How will BellSouth notify CLEC(s) of Fatal Error Conditions? (continued)
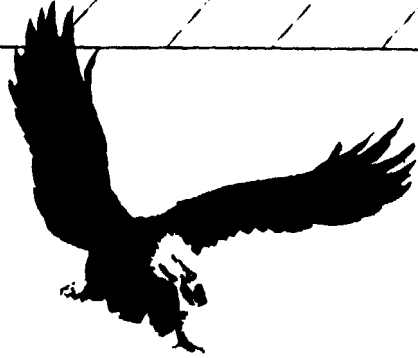
‾‾ =unique error code

Example: N9*R9*3000 (Plus Text)
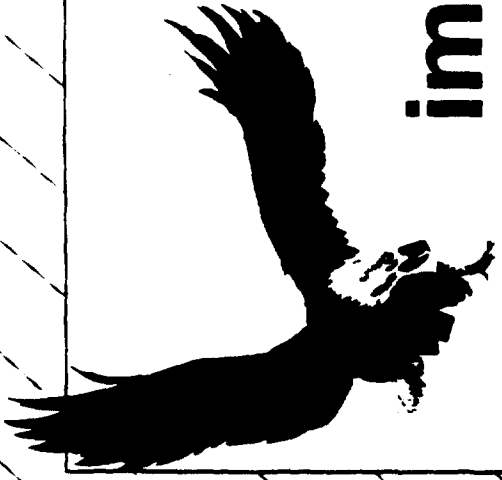
N9*R9*3015 (Plus Text)

N9*R9*3021 (Plus Text)

N9*R9*3022 (Plus Text)

Note: *100 characters of text can be used to provide error message in English language*
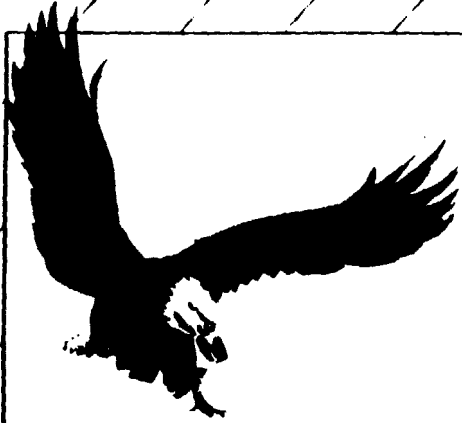
How will CLEC(s) correct Fatal Error Conditions?

- When an LSR is re-submitted to correct a Fatal Error condition, it must be in the form of an 850 Transaction (not an 860).
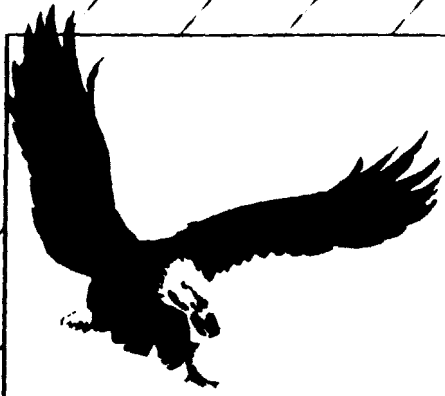
- The same PON may or may not be used.

How many Fatal Error conditions will be implemented in BellSouth?

- Approximately 239

What's Next?

1. Submit BellSouth's "REJECTS" package to next OBF Meeting.

2. Socialize, evaluate, and approve as the Industry Standard for "REJECTS".
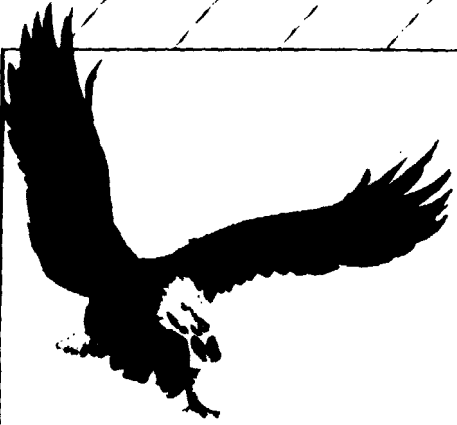
Clarifications (Non-Fatal Errors) Defined

- Clarifications for 850's are defined as all other errors that do not fit the fatal error definitions as previously defined in this document.

- Clarifications for 860's include all errors, both Fatal and Non-Fatal.

How will BellSouth notify CLEC(s) of Clarifications (Non-Fatal) Error Conditions?

- A new on-line feature will be provided to enable the LCSC personnel to select clarification message(s) (as appropriate) to be sent electronically to the CLEC(s) that are EDI Users.

- For Non-EDI users, it will be business as usual.

Meanwhile . . .

- BellSouth will implement an "Interim Process" to electronically notify CLEC(s) of Fatal Error conditions.

- Clarifications (Non-Fatal Errors) will continue to be faxed to CLEC(s).

How does the Interim Process differ from the Long-Term Plan?

- Interim Process = Approximately 162 Fatal Error Messages

  (see attached list of error messages)

- Long Term Plan = Approximately 239 Fatal Error Messages (see binder)

- Some Interim Fatal Error Messages will not endure for Long Term

How does the Interim Process differ from the Long-Term Plan? (continued)

- The Supplemental (860) Transaction (not 850) will be used to correct the Fatal Error(s).